



ADVOCARE®
We Build Champions

February 08, 2005

Office of Nutritional Products
Labeling and Dietary Supplements (HFS-810)
Center for Food Safety and Applied Nutrition
U.S. Food and Drug Administration
5100 Paint Branch Parkway
College Park, MD 20740

FEB 14 2005

Pursuant to the requirements of Section 6 of the Dietary Supplement Health and Education Act of 1994, 21 U.S.C. 343 r (6) and in accordance with the authorized provisions of 21CFR 101.93, AdvoCare provides notification for statements on dietary supplement labels as follows:

The name and address of the manufacturer, packer or distributor of the dietary supplement that bears the statements:

AdvoCare International, L.P.
2727 Realty Road
Carrollton, TX 75006

Product Name: Metabolic Enhancer

Statement(s)

Provides nutritional metabolic support for maintaining strength and energy levels.

Helps to manage appetite

Aids in maintaining cholesterol levels that are within the normal range.

Basis for Statement

Vitamin C (as potassium/magnesium/sodium ascorbates)
Taurine
L-Carnitine (as tartrate)
Chromium (as citrate)
Iodine (as potassium iodide)
Guarana extract (Paullinia cupana)
Vitamin B-6 (as pyridoxine HCl)
Oolong tea extract (Camellia sinensis)
Eleuthero extract (Eleutherococcus senticosus)
Vanadium (as bis-maltolato-oxovanadium)
Zinc (as zinc monomethionine – OptiZinc)

Garcinia extract (fruit – Garcinia cambogia)
Oolong tea extract (leaf - Camellia sinensis)
Guarana extract (seed - Paullinia cupana)
Tulsi extract (leaf – Ocimum sanctum)
Gymnema extract (leaf – Gymnema sylvestre)
Chromium (as citrate)

Beta-sitosterol
Vitamin B-6 (as pyridoxine HCl)
Tulsi extract (leaf – Ocimum sanctum)
Vanadium (as bis-maltolato-oxovanadium)

975 0162

LET 15640

2727 Realty Road, Carrollton, TX 75006

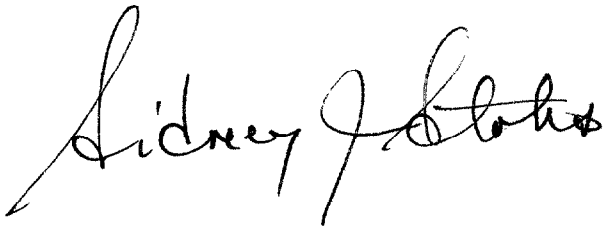
Provides antioxidant activity

Vitamin C (as potassium/magnesium/sodium
ascorbates)
Zinc (as zinc monomethionine)
Oolong tea extract (Camellia sinensis)
Eleuthero extract (Eleutherococcus senticosus)
Taurine

Certification

The undersigned certifies that the information contained in this notice is complete and accurate and that AdvoCare International, L.P. has substantiation that the statements are truthful and not misleading.

Respectfully yours,

A handwritten signature in black ink, reading "Sidney J. Stohs". The signature is written in a cursive, flowing style with a large initial 'S'.

Sidney Stohs, Ph.D.
Senior Vice President, Research and Development
AdvoCare International, L.P.